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Exhibit 4

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHR CASTILLO
and MONIQUE TRUJILLO, individually and
on behalf of all other similarly situated,

Case No. 5:20-cv-03664-LHK

Plaintiffs,

V.

GOOGLE LLC,

Defendant.

1 PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil
2 Procedure, on a date to be agreed upon by the Parties, counsel for Plaintiffs will take the videotaped
3 deposition(s) of the designated representative(s) of Google LLC (“Google”) best able to testify as
4 to the Topics set forth in Appendix A. Google has a duty to designate one or more officers, directors,
5 managing agents, or other persons with sufficient knowledge to testify fully regarding the Topics
6 listed in Appendix A. No later than ten business days prior to the deposition, Google shall identify
7 the person(s) who will testify on its behalf pursuant to this notice and the matter(s) about which
8 each person will testify. Google shall also produce to Plaintiffs any documents that Google used or
9 plans to use to prepare the person(s) testifying.

10 The deposition(s) shall be taken through a mutually agreed upon videoconference program
11 and before a Notary Public or some other officer authorized by law to administer oaths for use at
12 trial. The deposition(s) will be videotaped and will continue from day to day until completed.
13

14 Dated: April 27, 2021

BOIES SCHILLER FLEXNER LLP

15 By: 
16 Mark C. Mao

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APPENDIX A

DEFINITIONS

1. The term "ALL" includes the word "ANY," and vice versa.

2. The term "CLASS PERIOD" means the time period from June 1, 2016 through the present and ongoing.

3. The terms "CONCERNING" or "RELATING TO" include addressing, analyzing, concerning, constituting, containing, commenting on, discussing, describing, identifying, in connection with, referring to, reflecting, relating, relating to, reporting on, stating, or dealing with, in whole or in part, in addition to their customary and usual meanings, and shall be construed in the broadest sense possible.

4. The term “DOCUMENT” and “DOCUMENTS” shall be synonymous in meaning and equal to the broadest meaning provided by Rule 34 of the Federal Rules of Civil Procedure INCLUDING, without limitation, original and any non-identical copy of every kind of written, printed, typed, recorded, or graphic matter, however produced or reproduced, including all correspondence, letters, telegrams, telexes, messages, memoranda, instructions, emails, handwritten or recorded notes, and all records, schedules, reports, surveys, calculations, transcripts, notes, time cards, personal expense reports, appointment books, calendars, plans, purchase orders, contracts, subcontracts, charts, COMMUNICATIONS, database, data compilation, diary, draft, drawing, electronically stored information, emails, fax, floppy disk, graph, hard drive, image, index, instant message, letter, log, magnetic tape, memorandum, note, optical disk, photograph, report, sound recording, spreadsheet, storage device, text message, version, voicemail or writing. This term shall apply to any DOCUMENT, whether in hard copy or electronic form, on any computers or other system. Any copy of a DOCUMENT that differs in any respect.

5. The term “GOOGLE” means GOOGLE LLC and any of its directors, officers, consultants, agents, representatives, predecessors in interest, subsidiaries, assignees, licensees, employees, attorneys and any other persons acting on GOOGLE LLC’S behalf, including contractors.

1 6. The term “INCLUDE” or “INCLUDING” means “include, but not limited to” or
 2 “including, but not limited to.”

3 7. The term “INFORMATION” or “USER’S INFORMATION” means information
 4 concerning a USER or a USER’S device(s), including a USER’S browsing activity, such as GET
 5 requests (or copies thereof) sent from a USER’S browser to a WEBSITE; any referrer page or search
 6 queries; any “fingerprint” data (as described in paragraphs 100–04 of the Second Amended
 7 Complaint); a USER’S IP address; any geolocation data; and any X-Client Data Header.

8 8. The term “USER” includes the word “CONSUMERS,” and vice versa

9 9. The term “YOU” or “YOUR” means or refers to DEFENDANT GOOGLE LLC,
 10 and any of his or their attorneys, agents, representatives, predecessors, successors, assigns, and any
 11 PERSONS acting or purporting to act on his or their behalf.

GENERAL INSTRUCTIONS

12 For purposes of reading, interpreting, or construing the scope of the DEFINITIONS,
 13 INSTRUCTIONS, and TOPICS, all of the terms shall be given their most expansive and inclusive
 14 interpretation. This INCLUDES the following:

- 15 (a) The singular form of a word shall be interpreted as plural and vice versa.
- 16 (b) “And,” “or,” as well as “and/or” shall be construed either disjunctively or
 conjunctively as necessary to bring within the scope of the Topic anything
 that might otherwise be construed to be outside the scope of the Topic.
- 17 (c) “All,” “each” and “any” shall be construed as “all, each, and any.”
- 18 (d) The use of a verb in any particular tense shall be construed as the use of
 the verb in all other tenses as necessary to bring within the scope of the
 Interrogatory that might otherwise be construed to be outside the scope of
 the Interrogatory.

TOPICS

- 21 1. Identification of logs, database, storage systems, and data structures containing private
 22 browsing information and data derived from private browsing, including “raw logs”

- 1 [REDACTED]
- 2 2. Google's ability (regardless of Google's policies) to search for and collect private browsing
- 3 information from the logs, databases, storage systems, and data structures identified in
- 4 Topic 1, including through the use of Google internal databases and tools both by
- 5 individuals at Google and by automated mechanisms.
- 6 3. The origins of the logs, databases, storage systems, and data structures identified in Topic
- 7 1, including how the tools, applications, systems, devices, and products and services that
- 8 generate the logs, databases, storage systems, and data structures have functioned during
- 9 the class period.
- 10 4. Google's retention policies and practices for the logs, databases, storage systems, and data
- 11 structures identified in Topic 1, including any changes during the class period.
- 12 5. Google's preservation for purposes of this litigation of the logs, databases, storage systems,
- 13 and data structures identified in Topic 1, including any changes during the class period.
- 14 6. As referenced and shown in logs, databases, storage systems, and data structures, Google's
- 15 identification and correlation of users, devices, electronic addresses, and any other
- 16 identifiers in connection with web browsing activities, including by the use of identifiers
- 17 decipherable only to Google (e.g., Google's X-Client-Data header, GAIA, [REDACTED]
- 18 [REDACTED] (and similar "twice baked" cookies or crackers))
- 19 and Google processes running on the device and any third party identifiers hosted by
- 20 Google.
- 21 7. How identifiers decipherable only to Google of Topic 6, (e.g., Google's X-Client-Data
- 22 header, GAIA, and [REDACTED] (and similar
- 23 "twice baked" cookies or crackers)), are created, determined, and derived.
- 24 8. As referenced and shown in logs, databases, storage systems, and data structures, how and
- 25 when concurrent Google processes on a device, outside of the user's browser, may interact
- 26 or capture private browsing data, whether directly or indirectly.
- 27 9. As referenced and shown in logs, databases, storage systems, and data structures, how and
- 28 when Google processes attempt to link, correlate, associate, or otherwise join either

1 probabilistically or deterministically data collected from concurrent processes on a device,
2 including in connection with private browsing data.

- 3 10. How and when concurrent Google processes on a device, outside of the user's browser,
4 may generate logs, database, storage system, and data structure entries that include private
5 browsing data or data derived from private browsing information.
6 11. How data generated by Google's provision of its products and services is logged, stored,
7 and structured by Google, including private browsing data.
8 12. Identification of Google employees with responsibilities tied to Topics 1-11.

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PROOF OF SERVICE

I, Vicky L. Ayala, declare:

I am a citizen of the United States and employed in the City and County of San Francisco, CA. I am over the age of 18 and not a party to the within action; my business address is 44 Montgomery St., 41st Floor, San Francisco, CA 94104.

On April 27, 2021, I served the following document(s) described as:

PLAINTIFFS' NOTICE OF DEPOSITION PURSUANT TO RULE 30(b)(6)

- BY FACSIMILE TRANSMISSION:** As follows: The papers have been transmitted to a facsimile machine by the person on whom it is served at the facsimile machine telephone number as last given by that person on any document which he or she has filed in the cause and served on the party making the service. The copy of the notice or other paper served by facsimile transmission shall bear a notation of the date and place of transmission and the facsimile telephone number to which transmitted or be accompanied by an unsigned copy of the affidavit or certificate of transmission which shall contain the facsimile telephone number to which the notice or other paper was transmitted to the addressee(s).
 - BY MAIL:** As follows: I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at San Francisco, CA, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postage cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
 - BY OVERNIGHT MAIL:** As follows: I am readily familiar with the firm's practice of collection and processing correspondence for overnight mailing. Under that practice, it would be deposited with overnight mail on that same day prepaid at San Francisco, CA in the ordinary course of business.
 - BY ELECTRONIC MAIL TRANSMISSION:** By electronic mail transmission from vayala@bsflp.com on April 27, 2021, by transmitting a PDF format copy of such document(s) to each such person at the e-mail address(es) listed below their address(es). The document(s) was/were transmitted by electronic transmission and such transmission was reported as complete and without error.

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I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

1 Executed on April 27, 2021, at San Francisco, CA.
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Vicky L. Ayala

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Case No. 5:20-cv-03664-LHK

PROOF OF SERVICE